



OFFICE OF PUBLIC INSTRUCTION

PO BOX 202501
HELENA MT 59620-2501
www.opi.mt.gov
(406) 444-3095
(888) 231-9393
(406) 444-0169 (TTY)

Denise Juneau
Superintendent

July 31, 2009

Gene Wilhoit, Executive Director
CCSSO
One Massachusetts Ave, NW, Suite 700
Washington, DC 20001-1431

Dear Mr. Wilhoit:

Montana educators and I appreciate the opportunity to comment on the draft college and career readiness standards for mathematics and English language arts. The comments are attached with this letter.

My staff, in conjunction with a panel of secondary educators and university professors, extensively reviewed the draft documents. These reviewers included educators who have been involved in the standards revision process in Montana and are respected members of the Montana education community. We believe a collaborative approach leads to transparency and a commitment to the rich and rigorous content of our state standards.

In this spirit, I request that you extend the development process to increase the transparency of, and commitment to, the national core standards initiative. A rushed process serves no one well. Further, I request that you post on your Web site all comments received in the review process. A response to each comment should be developed and posted as well. The public and all educators deserve to know and understand our work if the products are to have credibility, meaning, and usefulness.

Thank you again for the opportunity to comment on this important initiative. I look forward to an improved process that is more inclusive, more comprehensive in content, and more defensible. If more information is needed, please contact Assistant Superintendent Nancy Coopersmith at ncoopersmith@mt.gov or (406) 444-5541.

Sincerely,

A handwritten signature in cursive script that reads "Denise Juneau".

Denise Juneau
State Superintendent

Attachment

**Montana's Response to the College and Career Readiness Standards for Mathematics and
Reading, Writing and Communication
July 31, 2009**

1. What are your overall impressions of the College and Career Readiness Standards?

- Our Nation deserves quality readiness standards created through a more inclusive K-16 process. Our Nation deserves better.
- There is an omission of any recognition of any or all culture; specifically the cultural heritage of Montana American Indians. Montana integrates this state constitutional mandate throughout all curricular areas and does not treat it as an "addition" to the standards. The college and career readiness standards do not provide this integration nor allude to its necessary inclusion.

Constitution of Montana -- Article X -- EDUCATION AND PUBLIC LANDS

MCA 20-1-501 (Indian Education for All)

20-1-501. Recognition of American Indian cultural heritage -- legislative intent. (1) It is the constitutionally declared policy of this state to recognize the distinct and unique cultural heritage of American Indians and to be committed in its educational goals to the preservation of their cultural heritage.

(2) It is the intent of the legislature that in accordance with Article X, section 1(2), of the Montana constitution:

(a) every Montanan, whether Indian or non-Indian, be encouraged to learn about the distinct and unique heritage of American Indians in a culturally responsive manner; and

(b) every educational agency and all educational personnel will work cooperatively with Montana tribes or those tribes that are in close proximity, when providing instruction or when implementing an educational goal or adopting a rule related to the education of each Montana citizen, to include information specific to the cultural heritage and contemporary contributions of American Indians, with particular emphasis on Montana Indian tribal groups and governments.

(3) It is also the intent of this part, predicated on the belief that all school personnel should have an understanding and awareness of Indian tribes to help them relate effectively with Indian students and parents, that educational personnel provide means by which school personnel will gain an understanding of and appreciation for the American Indian people.

History: En. Sec. 1, Ch. 527, L. 1999.

- These readiness standards must realistically address career readiness. From the university professors' perspective on our review committee, these readiness standards appear to address only college-bound students.
- It appears that people with different points of view wrote these documents. This is evident in the disjointed use of language even within the academic fields and the

inconsistent format. The lack of connection within the document and across academic areas results in documents that are not coherent or congruent.

- The use of new language (e.g., principles, coherent understanding) or previously used language with various definitions (e.g., standards, strands, benchmarks) is unclear. The language must be clearly defined.
- In Media Literacy and Speaking and Listening, Montana's content standards are more rigorous than the readiness standards. For example, Montana Speaking and Listening Content Standard 2: Students distinguish among and use appropriate types of speaking and listening for a variety of purposes. Variety of purposes is not addressed in the readiness standards.
- These readiness standards are more limiting than Montana's. Montana's standards incorporate the use of technology and the integration of culture. More than recognize, describe, analyze; Montana's proficient student is expected to justify, verify, prove and use deductive reasoning.

2. What are your concerns regarding this current readiness standards document?

Mathematics Review

- The College and Career Readiness Standards for Mathematics are inconsistent in specificity, rigor and realism for all career **and** college ready students. Some of the Core Concepts and Core Skills are extremely rigorous; others are realistically rigorous, while others are unrealistically low.
- The College and Career Readiness Standards for Mathematics are not a balanced set of concepts, they only focus on Algebra.
- The document is written in a fragmented fashion. The Mathematical Practices are not incorporated within the document. The Coherent Understanding, Core Concepts and Core Skills are not connected. For example: recursion is addressed in A Coherent Understanding of Statistics, but is not in the Core Concepts or Core Skills. Although the conceptual metamathematical language is enjoyable to read it does not give a clear understanding of the expectations.

Reading, Writing, and Communication Review

- While the College and Career Readiness Standards for Reading, Writing, and Communication are rigorous, they are not always realistic. The Core Readiness standards contain skills that all students should know and be able to do, but the complexity of the texts does not seem to match those skills and may increase the readiness standards to an unrealistic level of expectation. These readiness standards appear to be a "sorter" of students; academia versus the world of work.

- Communication is inherently a collaborative process. It is essential that this process explicitly includes collaboration. For example, when reading, collaboration or discussions are a means of constructing meaning; and when writing, collaboration is essential to providing the writer with the feedback necessary to revise effectively. Collaborative aspects of group and interpersonal dynamics are essential to written and spoken language. In addition, the readiness standards need to acknowledge that reading, writing, and communication experiences enhance our human experience and are not just a means to career or college readiness.
- The use of the word text only implies written and does not include video and audio text.
- In the Application of the Core Media, the focus is on computer-based media. This definition needs to be expanded.

3. What do you like about this current standards document?

Mathematics Review

- Mathematical Practices address the five strands of mathematical proficiency: procedural fluency, conceptual understanding, strategic competence, adaptive reasoning, and productive disposition.
- Each Principle contains a section describing the connections to other Principles. For example: Statistics Principle described "Connections to Probability, Expressions, and Number."
- The three levels, A Coherent Understanding, Core Concepts, and Core Skills, provide important ways to look at each Principle. For example: Coordinates Principle includes "Core Concepts, A Coherent Understanding of Coordinates, and Core Skills."

Reading, Writing, and Communication Review

- The connection charts within the "Applications of the Core" show coherence between research and media and the Reading, Writing, and Speaking and Listening Core Standards.
- The clarity and rigor of the Core Standards for college-bound students is evident.
- The Core Standards clearly promote reading and writing across all content areas. These Core Standards will create a necessity for all content area teachers to incorporate reading and writing in the curriculum.

4. Recommendations, Questions and Comments

Recommendations

- Use the same tool(s) and criteria that have been used to evaluate state content standards to guide the quality for this set of readiness standards.
- Create a balanced set of cohesive Coherent Understandings, Core Concepts, and Core Skills that include the Mathematical Practices that are measureable. This includes reasoning and making sense, as well as discrete mathematics.
- The following should be included: a definition and purpose of literature; reading for one's own purpose; discussing reading to discover other people's understanding; interpretation and evaluation of texts; writing to learn, reflect, and explore; sentence fluency in writing; seeking feedback to improve writing; collaborative writing; an addition to writing "to convey experiences"; problem solving, group processes and feedback in speaking and listening, as well as empathy and active listening.

Questions

- What is meant by Internationally Benchmarked Standards? What process is used to develop Internationally Benchmarked Standards and was this process applied to the development of these readiness standards?
- Where is the evidence that these readiness standards are research-based? It is not clear these readiness standards incorporate the works cited.
- College and career ready - is this all we care about in education? Is it not educating the whole person?
- Where are the processes and skills in writing and reading? Are they already expected to be mastered?
- Included in the Core Standards for Writing are "writing arguments" and "writing to inform or explain"; why is narrative writing only addressed as a side bar under "Required Range and Contexts"?
- Will balanced standards be written which address both college and career readiness?

Comments

- On examination of content standards from other countries; other nations include more than an Algebra focus.
- These readiness standards appear to be Back-to-Basic Standards written from a postsecondary viewpoint.